

ORIGINAL

Approved: Brandon D. Harper
BRANDON D. HARPER
Assistant United States Attorney

20 MAG 7843

Before: THE HONORABLE SARAH L. CAVE
United States Magistrate Judge
Southern District of New York

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: COMPLAINT
UNITED STATES OF AMERICA :
: Violation of
- v. - : 18 U.S.C. § 1708
:
KASIM CRAWFORD, :
: COUNTY OF OFFENSE:
: NEW YORK
Defendant. :
:
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

LAIZA GARCIA, being duly sworn, deposes and says that she is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE
(Theft and Receipt of Stolen Mail Matter)

1. On or about December 26, 2019, in the Southern District of New York and elsewhere, KASIM CRAWFORD, the defendant, knowingly did steal, take, and abstract, and by fraud and deception did obtain, and attempt so to obtain, from and out of mail, post offices, and stations thereof, letter boxes, mail receptacles, and mail routes and other authorized depositories for mail matter, and from letters and mail carriers, letters, postal cards, packages, bags, and mail, and did abstract and remove from such letters, packages, bags, and mail, articles and things contained therein, and did secrete, embezzle, and destroy such letters, postal cards, packages, bags, and mail, and articles and things contained therein, and did steal, take, and abstract, and by fraud and deception did obtain, letters, postal cards, packages, bags, and mail, and articles and things contained therein which had been left for collection upon and adjacent to collection boxes and other authorized depositories of mail matter, and did buy, receive, and conceal, and

unlawfully did have in his possession, letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, CRAWFORD stole and received mail out of a United States mail box located inside an apartment building on the Upper East Side of Manhattan.

(Title 18, United States Code, Section 1708.)

COUNT TWO

(Theft and Receipt of Stolen Mail Matter)

2. On or about December 28, 2019, in the Southern District of New York and elsewhere, KASIM CRAWFORD, the defendant, knowingly did steal, take, and abstract, and by fraud and deception did obtain, and attempt so to obtain, from and out of mail, post offices, and stations thereof, letter boxes, mail receptacles, and mail routes and other authorized depositories for mail matter, and from letters and mail carriers, letters, postal cards, packages, bags, and mail, and did abstract and remove from such letters, packages, bags, and mail, articles and things contained therein, and did secrete, embezzle, and destroy such letters, postal cards, packages, bags, and mail, and articles and things contained therein, and did steal, take, and abstract, and by fraud and deception did obtain, letters, postal cards, packages, bags, and mail, and articles and things contained therein which had been left for collection upon and adjacent to collection boxes and other authorized depositories of mail matter, and did buy, receive, and conceal, and unlawfully did have in his possession, letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, CRAWFORD stole and received mail out of mailroom located inside an apartment building on the Upper East Side of Manhattan.

(Title 18, United States Code, Section 1708.)

COUNT THREE

(Theft and Receipt of Stolen Mail Matter)

3. On or about January 28, 2020, in the Southern District of New York and elsewhere, KASIM CRAWFORD, the defendant, knowingly did steal, take, and abstract, and by fraud and deception did obtain, and attempt so to obtain, from and out of

mail, post offices, and stations thereof, letter boxes, mail receptacles, and mail routes and other authorized depositories for mail matter, and from letters and mail carriers, letters, postal cards, packages, bags, and mail, and did abstract and remove from such letters, packages, bags, and mail, articles and things contained therein, and did secrete, embezzle, and destroy such letters, postal cards, packages, bags, and mail, and articles and things contained therein, and did steal, take, and abstract, and by fraud and deception did obtain, letters, postal cards, packages, bags, and mail, and articles and things contained therein which had been left for collection upon and adjacent to collection boxes and other authorized depositories of mail matter, and did buy, receive, and conceal, and unlawfully did have in his possession, letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, CRAWFORD stole and received mail out of a United States mail box located inside an apartment building on the Upper East Side of Manhattan.

(Title 18, United States Code, Section 1708.)

COUNT FOUR

(Attempted Theft and Receipt of Stolen Mail Matter)

4. On or about January 28, 2020, in the Southern District of New York and elsewhere, KASIM CRAWFORD, the defendant, knowingly did steal, take, and abstract, and by fraud and deception did obtain, and attempt so to obtain, from and out of mail, post offices, and stations thereof, letter boxes, mail receptacles, and mail routes and other authorized depositories for mail matter, and from letters and mail carriers, letters, postal cards, packages, bags, and mail, and did abstract and remove from such letters, packages, bags, and mail, articles and things contained therein, and did secrete, embezzle, and destroy such letters, postal cards, packages, bags, and mail, and articles and things contained therein, and did steal, take, and abstract, and by fraud and deception did obtain, letters, postal cards, packages, bags, and mail, and articles and things contained therein which had been left for collection upon and adjacent to collection boxes and other authorized depositories of mail matter, and did buy, receive, and conceal, and unlawfully did have in his possession, letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken,

embezzled, and abstracted, to wit, CRAWFORD attempted to steal and receive mail out of a United States mail box located inside an apartment building on the Upper East Side of Manhattan.

(Title 18, United States Code, Section 1708.)

The bases for my knowledge and for the foregoing charge are, in part, as follows:

5. I am a United States Postal Inspector. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement officials, and on my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. I have been personally involved with an investigation into a string of mail thefts on the Upper East Side of Manhattan beginning on or about December 26, 2019. Our investigation has revealed several instances of mail theft and attempted mail theft, including completed mail thefts on or about December 26, 2019 (the "Apartment-1" theft), December 28, 2019 (the "Apartment-2" theft), January 28, 2020 (the "Apartment-3" theft), and an attempted theft on or about January 28, 2020 (the "Apartment-4" attempted theft).

7. On or about December 31, 2019, after learning of the Apartment-1 and Apartment-2 thefts, I conducted an interview of an employee ("Employee-1") at another apartment in the same neighborhood where there had been reports of mail theft ("Apartment-5") who regularly interacts with, gives outgoing mail to, and receives incoming mail from United States Postal Service ("USPS") employees. Employee-1 stated that on or about December 28, 2019, an African American male wearing a USPS uniform and USPS identification badge entered his apartment building on the Upper East Side of Manhattan and asked for the outgoing mail. Although Employee-1 recognized that the individual was not the usual mail carrier, Employee-1 gave the individual outgoing mail. Employee-1 then followed the individual outside where he observed the individual enter a black 2-door Honda Accord ("Vehicle-1"). Employee-1 took a

photograph of Vehicle-1, which included the vehicle's license plate.

8. Law enforcement officials ran Vehicle-1's license plate number through a law enforcement database that showed that Vehicle-1 was registered to a particular person ("Individual-1"). A search of another law enforcement database revealed that traffic tickets had previously been issued while Vehicle-1 was being driven by KASIM CRAWFORD, the defendant.

9. A search of USPS records revealed that KASIM CRAWFORD, the defendant, was previously a USPS mail carrier employed at the Grand Central Station in Manhattan, New York from approximately May 2019 until his employment was terminated in approximately October 2019.

10. I have personally reviewed surveillance video obtained from the apartments involved in the Apartment-1, Apartment-2, Apartment-3, and Apartment-4 thefts, and have learned the following:

a. On or about December 26, 2019 at approximately 12:37 p.m., an African American male wearing a blue USPS vest with a red and white stripe across the back enters a common area of Apartment-1. The individual appears to use a key to open a USPS mailbox and then removes a stack of mail. After again using what appears to be a key to close the postal box, the individual appears to put the key in his pocket and walks away.

b. On or about December 28, 2019 at approximately 11:51 a.m., an African American male wearing a blue USPS vest with a red and white stripe across the back enters a common area of Apartment-2. The individual then walks to the doorman's station where he receives and walks away with a stack of outgoing mail.

c. On or about January 28, 2020 at approximately 9:47 a.m., an African American male wearing what appears to be a red and black jacket with a white hood enters a common area of Apartment-3. The individual appears to use a key to open a USPS mailbox and then removes a stack of mail. After using what appears to be a key to close the postal box, the individual exits Apartment-3.

d. On or about January 28, 2020 at approximately 9:49 a.m., an African American male wearing what appears to be a black jacket with a white hood enters Apartment-4. The

individual then uses what appears to be a key to open a USPS mailbox. After noticing that there is no outgoing mail in the mailbox, the individual closes the mailbox and leaves Apartment-4.

11. I have reviewed multiple photographs of KASIM CRAWFORD, the defendant, including a Department of Motor Vehicles ("DMV") photograph and a USPS employee database photograph. Based on my review of the photographs and the surveillance video from Apartment-1, Apartment-2, Apartment-3, and Apartment-4, I believe that CRAWFORD, is the individual who stole or attempted to steal mail from each of those apartment buildings as described in paragraph 10.

12. On or about January 3, 2020, I interviewed an employee of Apartment-2 ("Employee-2") who interacted with the individual wearing a USPS vest who stole mail from Apartment-2 on or about December 28, 2019. Employee-2 described the individual as an African American male, short and slim, who was not the usual mail carrier. Employee-2 then identified a DMV photograph of KASIM CRAWFORD, the defendant, as depicting the person who stole mail from Apartment-2 on or about December 28, 2019.

13. Based on my review of New York City Police Department ("NYPD") license plate reader records and NYPD surveillance footage, I have learned the following:

a. On or about December 28, 2019, Vehicle-1 entered Manhattan, New York approximately one hour and twenty minutes prior to the theft at Apartment-2 and left Manhattan, New York approximately forty minutes after the theft at Apartment-2.

b. On or about December 28, 2019, Vehicle-1 was captured on an NYPD camera at the intersection of approximately 88th Street and East End Avenue on the Upper East Side of Manhattan.

c. On or about January 28, 2020, Vehicle-1 entered Manhattan, New York approximately one hour and a half prior to the theft at Apartment-3 and the attempted theft at Apartment-4 and left Manhattan, New York approximately one hour after the theft at Apartment-3 and the attempted theft at Apartment-4.

14. On or about January 24, 2020, law enforcement conducted surveillance at an address in Bronx, New York that was believed to belong to KASIM CRAWFORD, the defendant. Based on that surveillance, I have learned the following:

a. Law enforcement officers observed CRAWFORD exiting the apartment building.

b. CRAWFORD was observed entering Vehicle-1, which was located a few blocks away from the residence.

c. CRAWFORD was observed wearing what appeared to be a black and red jacket similar to the jacket that was later worn by the individual who committed the mail theft at Apartment-3 and the attempted mail theft at Apartment-4.

d. A USPS postal uniform was visible in the back seat of Vehicle-1.

15. On or about January 31, 2020, law enforcement officers conducted surveillance in Manhattan, New York. Based on that surveillance, I have learned the following:

a. Law enforcement officers observed KASIM CRAWFORD, the defendant, operating Vehicle-1.

b. CRAWFORD parked Vehicle-1 on a street on the Upper East Side of Manhattan.

c. CRAWFORD exited Vehicle-1 wearing what appears to be a red and black jacket and a white hood.

d. CRAWFORD appeared to attempt to gain entrance to at least one apartment building on the Upper East Side of Manhattan and successfully entered another building in the same neighborhood.

16. Throughout the course of this investigation, law enforcement officers have spoken with numerous individuals who placed checks in the outgoing mail boxes at their apartment buildings on the Upper East Side of Manhattan. Based on those interviews, I have learned the following:

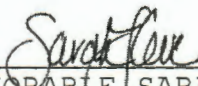
a. Individuals residing at Apartment-1, Apartment-2, and Apartment-3 have reported either noticing that checks they placed in the outgoing mail appear to have been stolen, washed, and deposited in significantly higher amounts than intended and by individuals they did not recognize or canceling checks that were placed in their outgoing mail because of reports of suspicious activity.

b. Checks that appear to have been stolen from Apartment-1 and Apartment-2 during the thefts described in paragraph 10 were deposited in amounts totaling more than \$29,000, far greater than the amounts originally intended by the check writers. In addition, the checks were not deposited into the accounts of the intended individuals.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of KASIM CRAWFORD, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

_____/s Laiza Garcia_____
LAIZA GARCIA
Postal Inspector
United States Postal
Inspection Service

Sworn to me through the transmission of this Complaint by reliable electronic means, Facetime, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1 This 27th day of July, 2020



THE HONORABLE SARAH L. CAVE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK